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February 17, 2021

VIA ECF ONLY

Hon. Edgardo Ramos, U.S.D.J.
Thurgood Marshall United States Courthouse
Courtroom 619
40 Foley Square
New York, NY 10007

RE: POOF-SLINKY, LLC v. A.S. PLASTIC TOYS CO., LTD., et al.
Civil Action No.: 19-cv-9399

Dear Your Honor,

This office represents the following defendants in the above matter:

A.S. Plastic Toys Co., Ltd.

Amy & Benton Toys & Gifts Co., Ltd.

Believe-fly Trading (Toys) Co., Ltd. (Shantou)

Guangdong Hershey Spring Industrial Co. Ltd.

Hhsmile

Longyan Lang Ling Heng Chuang Trading Ltd.

Nbjustin

Ningbo Zhenrong Intn'l Trading Co., Ltd.

Shantou Chenghai Haoda Toys Co., Ltd.

Shantou Chenghai Hengya Toys Co., Ltd.

Shantou Chenghai Pengcheng Toy Ind. Co., Ltd.

Shantou Chenghai Sweet Baby Toys Firm

Shantou Chenghai Yuansheng Toys Industry Co., Ltd.

Shantou Chenghai Yueqi Toys Firm

Shantou City Chenghai Xinbooming Toys Factory

Shantou H&C Toys & Crafs Manufactory

Shantou Kunyang Trading Co., Ltd.

Shantou Longhu XuChang Toys Firm

Shantou Lucky Toys & Gift Firm

Shantou Mingtong Toys Industrial Co., Ltd.

Shantou South Toys Factory

Shantou Tianyi Toys Industrial Co., Ltd.

Hengjun Plastic Toys Manufactory Shaoxing Jinlangte Sports Goods Co., Ltd.

Shenzhen X-World Technology Co., Ltd.

Shenzhen Gift Joint Promo Co., Ltd.

Wenling Bestone Commodity Factory

Yiwu B&T Crafts & Arts Co., Ltd.

Yiwu Power Import & Export Co., Ltd.

Yiwu Qida Household Items Factory

Zhangping TK Toys And Gifts Co., Ltd.

Shantou Chenghai Kaishenglong Toys Factory

Shantou Jinyu Trading Co., Ltd., and

Great International Toys Ltd.

It is respectfully requested that the time of tomorrow's court appearance be moved from 11 am to 1 pm or 2 pm tomorrow, February 18, 2021, or to a later time/date, as per below.

I am due to appear at 9:45 am on the same day, February 18, 2021, at a telephonic court hearing before the New Jersey Supreme Court, in another court hearing matter.

That hearing had been scheduled way before the current 11 am hearing was scheduled in this matter. That case was entered on my calendar for 9:00 am for 2/18/2021, but I have learned earlier this morning that the case is actually on for 9:45 am for 2/18/2021, i.e., a mere 1 hour and 15 minutes before the hearing in this matter.

I do not know for how long the NJ Supreme Court hearing will last exactly, but it will be definitely more than 1 hour at least, based on the length of the previous hearing in that matter.

Therefore it is respectfully requested that the time of tomorrow's hearing in the present case be moved to 1 pm or 2 pm tomorrow, February 18, 2021. If that is not possible, then please reschedule it for Friday, February 19, 2021, at any time after 1:30 pm, as I am engaged in another hearing in another matter on February 19, 2021, between 10:30 am and 1:30 pm. Alternatively, I am also available on February 22, 2021 after 12:00 pm, on February 23, 2021 before 1 pm, and all days on February 24 and 25, 2021.

I have reached out to the adversary attorney, Brienne Scully, to get her consent to the requested adjournment of the hearing time in this matter, in order to submit a joint adjournment request to the Court, but she informed me today by email that she is not available at either 1 pm or 2 pm tomorrow, unfortunately.

Therefore, I respectfully request the court to accommodate me in this scheduling matter and have tomorrow's 11 am appearance re-scheduled to a later time or date, as per above.

Many thanks for your courtesies.

Best regards,



Sergei Orel

CERTIFICATION OF SERVICE

I certify that on this 17th day of February, 2021, the foregoing was delivered by ECF to, and I have mailed a copy of this pleading, via email to bscully@ipcounselors.com to:

Brienne Scully, Esq., Epstein Drangel LLP, 60 East 42nd Street, Suite 2520, New York, NY 10165

Dated: February 17, 2021

_____/Sergei Orel/
Sergei Orel, Esq.